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December 15, 2014

VIA Fax

Honorable Joel Schneider
United States Magistrate Judge
Mitchell H. Cohen Building & U.S. Courthouse
4th and Cooper Streets, Room 1050
Court Room 3C
Camden, NJ 08101
Fax: 856-757-5355

RE: Neuner v. Selective Insurance Company of America,
U.S.D.C. NJ No. 1:14-CV-03776-RBK-JS

Dear Judge Schneider:

I write to respectfully request a 14-day extension of the fact discovery deadline in this case. The parties have exchanged written discovery, and are in the process of preparing responses to same. The parties are seeking an additional 14 days to respond to written discovery, and to correspondingly extend the fact discovery deadline by 14 days to complete fact witness depositions. The parties are also seeking a corresponding extension of the deadline for factual discovery motions and applications made returnable. The parties do not anticipate that these extensions will impact any other deadlines. The parties have conferred, and jointly propose the following schedule:

- Responses to written discovery by December 29, 2015;
- Depositions of fact witnesses and completion of all fact discovery by January 28, 2015;
- All factual discovery motions and applications made returnable by January 28, 2015;
- Plaintiff's expert disclosures by February 13, 2015;
- Defendant's expert disclosures by March 16, 2015;

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- Deposition of experts by April 14, 2015.

We note that the Court has scheduled a telephone status conference for January 15, 2015 at 10:30 a.m. In the event that the discovery schedule is extended, the Court may wish to reschedule the status conference to February 18, 2015, or another date at the Court's convenience. We will await the Court's guidance in that regard.

We thank the Court for its consideration in this matter.

Respectfully,

/s/ Alex L. Rubenstein
Alex L. Rubenstein

cc: Andrea M. Wilkovich, Esq.
Eric M. Hurwitz, Esq.

FOR good cause shown
requested extension
GRANTED.

So Ordered this 15th day
of December, 20 14
Joel Schneider
JOEL SCHNEIDER, USMJ